

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

## UNITED STATES DISTRICT COURT

for the

South District of Texas

Houston Division

ROCKETLADY UNLIMITED ENTERPRISES, LLC  
D/B/A OUR HEARTS TOGETHER, LLC

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

RELIANT RETAIL ENERGY, LLC, SUNRUN  
GEMINI MANAGER, GOODLEAP, ASSURANT,  
TMOBILE, ATT, XFINITY, BSG, MIKE CALVERT  
TOYOTA, TEJAS TOYOTA,

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. \_\_\_\_\_

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	ROCKETLADY UNLIMITED ENTERPRISES, LLC D/B/A
Street Address	P.O. BOX 2992 Our Hearts Together, LLC
City and County	HUMBLE TX
State and Zip Code	77347-2992
Telephone Number	832-755-2001
E-mail Address	N/A

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

## Defendant No. 1

Name	RELIANT RETAIL ENERGY, LLC
Job or Title <i>(if known)</i>	Bruce Stevenson (Regulatory Manager)
Street Address	P.O. Box 4567,
City and County	Houston, TX
State and Zip Code	77210-4567
Telephone Number	713-207-6072
E-mail Address <i>(if known)</i>	Bstevenson@,reliant.com

## Defendant No. 2

Name	SUNRUN GEMINI MANAGER
Job or Title <i>(if known)</i>	
Street Address	211 E. 7TH STREET, SUITE 620
City and County	AUSTIN, TX
State and Zip Code	78701
Telephone Number	
E-mail Address <i>(if known)</i>	

## Defendant No. 3

Name	GOODLEAP
Job or Title <i>(if known)</i>	Maria Mellott - Vice President Deputy Chief Compliance Officer
Street Address	8781 Sierra College Blvd
City and County	Roseville, CA
State and Zip Code	95661
Telephone Number	916-772-9048
E-mail Address <i>(if known)</i>	consumercomplaints@goodleap.com

## Defendant No. 4

Name	ATT
Job or Title <i>(if known)</i>	
Street Address	PO BOX 10330
City and County	FORT WAYNE, IL
State and Zip Code	46851-0330
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant Nos (5-9)

5 T-MOBILE

441 4th Street,  
NW Washington, DC

6 XFINITY MOBILE

Comcast Customer Security Assurance Attention Fraud Department  
1800 Bishops Gate Blvd  
Mt Laurel Township, NJ 08054

7 Assurant

American Bankers Insurance Company of Florida  
11222 Quail Roost Drive, Miami, FL 33157-6596. BSG,

8 MIKE CALVERT TOYOTA,  
2333 S Loop W.  
Houston, TX 77054-2811

9 TEJAS TOYOTA

19011 Highway 59 North  
Humble, TX 77338

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Fair Debt Collection Practices Act as amended by Public Law 111-203, title X, 124 Stat. 2092 (2010) National Telecommunications and Information Administration Organization Act, 47 U.S.C. 901 et seq., as amended by the Middle Class Tax Relief and Job Creation Act of 2012, Pub. L. 112-96, Title VI, Subtitle G, 126 Stat. 245 (Feb. 22, 2012) (47 U.S.C. 923(g)-(l), 928) and the Spectrum Pipeline Act of 2015, Title X of the Bipartisan Budget Act of 2015, Pub. L. 114-74, 129 Stat. 621 (Nov. 5, 2015) (47 U.S.C. 923, 928). TARIFFS Authority: 47 U.S.C. 151, 154(i), 154(j), 201-205, 403, unless otherwise noted. Source: 49 FR 40869, Oct. 18, 1984, unless otherwise noted. Minority Business Development Agency § 9.20 Backup power obligations.

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* \_\_\_\_\_, is a citizen of the State of *(name)* \_\_\_\_\_.

**b. If the plaintiff is a corporation**

The plaintiff, *(name)* ROCKETLADY UNLIMITED Enterprises, LLC, is incorporated under the laws of the State of *(name)* TEXAS,

and has its principal place of business in the State of *(name)* \_\_\_\_\_.

TEXAS

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, *(name)* \_\_\_\_\_, is a citizen of \_\_\_\_\_.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

the State of (name) TEXAS . Or is a citizen of  
 (foreign nation) unknown

b. If the defendant is a corporation

The defendant, (name) RELIANT RETAIL ENERGY, et al , is incorporated under  
 the laws of the State of (name) TEXAS , and has its  
 principal place of business in the State of (name) TEXAS  
 Or is incorporated under the laws of (foreign nation) TEXAS ,  
 and has its principal place of business in (name) TEXAS

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Dis closed US Currency.  
 amount in controversy, RELIANT ENERGY RETAIL adhere to UNITED  
 STATES regulatory agencies that govern the protections under the Constitution in prospective  
 to ROCKETLADY UNLIMITED ENTERPRISES d/b/a OUR HEARTS  
TOGETHER, LLC

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

RELIANT ENERGY RETAIL, LLC provided support for securities fraud through using encumbered funds for real property 19902 Rustlewood Dr., Humble, TX 77338 established from relief of natural disasters and minority owned business to enhance property and created financial hardship to residents via (Goodleap and Sunrun). Goodleap provided technological support through artificial intelligence to Tesla backup power supply housed on property that violated Title 47 Code of Federal Regulations by placing and placed a UCC Property Lien in Harris County Appraisal District with the absence of contract and misleading business practices which violate the Fair Credit Collection Practices Act. Continually, GOODLEAP worked with COMCAST and policing agencies to inflict injury and create financial hardship for residents of real property through releasing property information. Toyota, Goodleap, Sunrun Gemini Manager, LLC, ATT (used various collection agencies in the absence of debt) to send continued text, robo and SPAM calls VIA COMCAST 911 services to maintain backup power obligations to real property in the absence of landline, which is not available at aforementioned property in the absence of cable service. Insurance fraud was committed on ROCKETLADY UNLIMITED ENTERPRISES, LLC D/B/A OUR HEARTS TOGETHER, LLC company mobile lines and employee's personal mobile lines by ordering additional phones via assurant 3<sup>rd</sup> party app by SUNRUN GEMINI MANAGER'S foreign filed offices herein by committing brand impersonation acting in the name of ROCKETLADY UNLIMITED ENTERPRISES, LLC D/B/A OUR HEARTS TOGETHER, LLC, and preventing the further development of minority business owned enterprises out of grant funding. T-Mobile created barriers to accessing mobile account and used store employees at both Corporate and Registered Agents to steal login credentials such as PIN numbers, and establish profiles in various names of key employees to gain access and make changes to services. All of the aforementioned are a violation of RLE and employees 4<sup>th</sup> and 5<sup>th</sup> amendment rights in accordance to the United States Constitution. In addition Toyota Dealers (Mike Calvert and Toyota via the Toyota App and Satellite radio installed Earth Stations in Motion with (Non-Geostationary Orbit Space Stations) to create a blanket network and steal company trade secrets.

#### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

US Dollars in addition to uncalculated amount to be provided in the motion. Relief amount dictated from public record, and provided at case summation. Amount will be stricken from record, and diplomatic immunity to LEGAL ENTITY and LEGAL FICTION, DR. LAKEISHA MENIFEE.

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 06/24/2024

Signature of Plaintiff

Printed Name of Plaintiff

*Lakeisha J. Meniffee*  
DR. LAKEISHA MENIFFEE

CEO, ROCKETLADY UNLIMITED ENTERPRISES, LLC  
100% owner

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

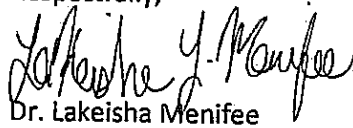
Telephone Number

E-mail Address

June 25, 2024

Plaintiff, Dr. Lakeisha Hamilton, is requesting waiver of all fees associated with PACER in the research and development of Cause No: \_\_\_\_\_. In addition, Plaintiff has submitted the Financial Inability to pay for Court Proceedings which is greatly due to interference of Defendants in aforementioned cause.

Respectfully,



Dr. Lakeisha Menifee

LEGAL FICTION

CEO ROCKETLADY UNLIMITED ENTERPRISES, LLC (100% Owner)  
CEO ABUNDANCE ENERGY CONSORTIUM, LLC (100% Owner).



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New York State Corporation Entity

Sunrun Gemini Manager 2023, LLC

80 State Street, Albany, NY 122072543

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Overview

SUNRUN GEMINI MANAGER 2023, LLC (DOS #7075770) is a *Foreign Limited Liability Company* in Albany registered with the New York State Department of State (NYSDOS). The business entity was initially filed on September 11, 2023. The registered business location is at *80 State Street, Albany, NY 122072543*. The DOS process contact is *C/O Corporation Service Company*.

Business Entity Information

DOS ID 7075770

Current Entity Name SUNRUN GEMINI MANAGER 2023, LLC

County Albany

Jurisdiction Delaware

Entity Type FOREIGN LIMITED LIABILITY COMPANY

Initial DOS Filing Date 2023-09-11

DOS Process Name C/O CORPORATION SERVICE COMPANY

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**Lastest Filing Information**

**Filing Number** 231102002621

**Filing Type** CERTIFICATE OF PUBLICATION

**Mod Cert Code** 49FA

**Approved Date** 2023-11-02

**Filing Date** 2023-11-01

**Entity Type** FOREIGN LIMITED LIABILITY COMPANY

**Current Entity Name** SUNRUN GEMINI MANAGER 2023, LLC

**Effective Date** 2023-11-01

**Foreign Incorporation Date** 2023-08-31

**Duration** PERPETUAL

**Law Section** LIMITED LIABILITY COMPANY - 802 LIMITED LIABILITY COMPANY LAW

**County** Albany

**Jurisdiction** DE

**Filer Name** CORPORATION SERVICE COMPANY

**Filer Address** 80 State St.  
225 bush street, suite 1400  
Albany  
NY 12207

**DOS Process Name** C/O CORPORATION SERVICE COMPANY

**DOS Process Address** 80 State Street  
Albany  
NY 12207-2543

**Entity Name History**

Filing Date	Entity Name	Filing Number	Type	Status
2023-09-11	SUNRUN GEMINI MANAGER 2023, LLC	230911000575	Actual	Active

**Entity Address History**

Filing Date	Address Type	Address Name	Address	Filing Number
2023-11-02	Service of Process	C/O CORPORATION SERVICE COMPANY	80 State Street, Albany, NY 12207-2543	231102002621
2023-09-11	Service of Process	C/O CORPORATION SERVICE	80 State Street, Albany, NY	230911000575

## Location Information

Street 80 STATE STREET  
Address

City ALBANY

State NY

Zip 122072543  
Code

## Corporations in the same location

Corporation Name	Address	Registered Agent Name	Initial DOS Filing Date
Gpg Pierrepont, LLC	80 State Street, Albany, NY 122072543		2024-05-22
Fairview Housing I and II, L.P.	80 State Street, Albany, NY 122072543		2024-05-21
Albright Housing, L.P.	80 State Street, Albany, NY 122072543		2024-05-21
Discovery Xt Employer LLC	80 State Street, Albany, NY 122072543		2024-05-21
Prime Storage Highland 9w, LLC	80 State Street, Albany, NY 122072543		2024-05-22
Empirx Health LLC	80 State Street, Albany, NY 122072543		2024-05-21
Lancaster Puppies Services, LLC	80 State Street, Albany, NY 122072543		2024-05-22
Mundestey New York LLC	80 State Street, Albany, NY 122072543		2024-05-21
Mn8 Solutions LLC	80 State Street, Albany, NY 122072543		2024-05-21
Chorlins & Chorlins, Inc.	80 State Street, Albany, NY 12207-2543		2023-08-03

Agent Name	Filing Date
Madison International Real Estate Liquidity Fund Ix (T), L.P.	2024-01-11
Legacy Transformational Consulting Inc	2019-03-13
Keystone Pharmacy Inc.	2024-05-01
Citic Enterprises, Inc.	2023-07-28
Niobium Microsystems, Inc.	2024-04-22
M. Walsh, Rpa, P.C.	2023-08-15
Applied Labs LLC	2017-10-10
Law Office of Christopher M. Van De Kieft, P.C.	2023-12-22
Tcb River Street Limited Partnership	2017-05-15
Service Disabled Veterans In Cannabis Association Inc.	2023-07-14

Find all corporations in the same zip code

#### Corporations in the same zip code

Corporation Name	Address	Registered Agent Name	Initial DOS Filing Date
Sonic Galaxy Inc.	418 Broadway STE R 88732, Albany, NY 12207		2024-04-01
Hair By Kerry Lynne LLC	418 Broadway STE N, Albany, NY 12207		2024-05-07
Teja Vu Organics LLC	418 Broadway #6284, Albany, NY 12207	New York Registered Agent LLC	2024-05-08
39komplex, Inc.	418 Broadway - STE V Albany, NY		2024-03-27

New York Black and African Literature Festival, Inc.	418 broadway, #5854, Albany, NY 12207		2024-05-13
595 Pacific Medical PLLC	418 BROADWAYm STE. R, Albany, NY 12207		2024-04-04
Maimouna Global LLC	488 Broadway Apt 211, Albany, NY 12207		2024-05-14
Victor Frazier Inc.	418 broadway # 8436, Albany, NY 12207	Ronald v Frazier Jr	2024-05-09
Kdot Inc.	418 broadway, STE R8739S, Albany, NY 12207		2024-04-23

Find all corporations in the same zip code

## Similar Entities

### Corporations with similar names

Corporation Name	Address	Registered Agent Name	Initial DOS Filing Date
Sunrun Balerion III Owner 2023, LLC	80 State Street, Albany, NY 12207-2543		2023-05-17
Sunrun Julius Holdco 2023-2, LLC	80 State Street, Albany, NY 12207-2543		2023-07-10
Sunrun Juno Manager 2023, LLC	80 State Street, Albany, NY 12207-2543		2023-02-27
Sunrun Ulysses Manager 2023, LLC	80 State Street, Albany, NY 12207-2543		2023-05-01
Sunrun Juno Owner 2023-B, LLC	80 State Street, Albany, NY 12207-2543		2023-06-12
Sunrun Julius Holdings 2023-2, LLC	80 State Street, Albany, NY 12207-2543		2023-07-10
Sunrun Boreas Owner 2023, LLC	80 State Street, Albany, NY 122072543		2023-08-31
Sunrun Ragnar	80 State Street, Albany, NY		2022-09-07

Sunrun Boreas  
Manager 2023,  
LLC

80 State Street,  
Albany, NY  
122072543

2023-08-31

## Improve Information

Do you have more information about *Sunrun Gemini Manager 2023, LLC*? Please fill in the following form.

Name

Address

Telephone

Email

Website

Description

Submit Form

## Dataset Information

This dataset includes about three million business entities and corporations registered with New York State Department of State (NYSDOS). The Department of State keeps a record of every filing for every incorporated business in the state of New York. Each business entity is registered with DOS ID, business legal name, type, filing date, registered agent name, office address, etc.

**Subject** Business and Economy

**Jurisdiction** State of New York

### Dataset Details

The New York State Department of State, one of the oldest and most diverse agencies in state government, works to make New York a more welcoming, equitable, and prosperous place for all who call it home. Established in 1778, and known as the Keeper of Records for more than two centuries, the Department improves the quality of life for all New Yorkers by providing a myriad of essential services and programs to local governments, businesses, community organizations and citizens. Business corporations, not-for-profit corporations, limited liability companies and limited partnerships must file a formation document with the New York State Department of State in order to do business within the State of New York. Each corporate, limited liability company or limited partnership name must be unique.

Out-of-state corporations which choose to do business in New York State must file with the Department of State an application for authority. If the entity name is not distinguishable from the name of all other entities on file with the Department of State, the corporation must use a fictitious name which, likewise, must be distinguishable from the name of all other entities on file with the Department of State. With some exceptions, each business corporation must submit a statement every two years verifying their service of process address and identifying the name and address of the chief executive officer of the corporation and the address of the principal executive office of the corporation. Limited liability companies must submit a statement every two years that verifies the service of process address.

This Corporation and Business Entity Database includes business and not for profit corporations, limited partnerships, limited liability companies, limited liability partnerships, and other miscellaneous businesses. The database also includes assumed name filings for corporations, limited liability companies and limited partnerships. Each business entity is registered with DOS ID, business legal name, entity type, filing date, registered agent name and address, officer name and address, office address, etc.

To give New Yorkers the access they deserve to government data and information, Governor Andrew M. Cuomo launched the Open NY initiative in March 2013 and signed Executive Order 95. It directs state agencies to identify, catalog, and publish their data on the state's open data website administered by the Office of Information Technology Services (ITS). Open NY increases transparency, improves government performance, empowers New Yorkers to participate in government, and encourages research and economic opportunities statewide.

OPENGOVNY Contact

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AO 440 (Rev. 06/12) Summons in a Civil Action

## UNITED STATES DISTRICT COURT

for the

ROCKETLADY UNLIMITED ENTERPRISES, LLC

Plaintiff(s)

v.

Civil Action No.

RELIANT RETAIL ENERGY, LLC

Defendant(s)

## SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

ROCKETLADY UNLIMITED ENTERPRISES  
P.O. BOX 2992  
HUMBLE, TX 77347-2992

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: \_\_\_\_\_

\_\_\_\_\_  
Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE***(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
 was received by me on *(date)* \_\_\_\_\_.

- ☐ I personally served the summons on the individual at *(place)* \_\_\_\_\_  
 \_\_\_\_\_ on *(date)* \_\_\_\_\_; or
- ☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
 \_\_\_\_\_, a person of suitable age and discretion who resides there,  
 on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or
- ☐ I served the summons on *(name of individual)* \_\_\_\_\_, who is  
 designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
 \_\_\_\_\_ on *(date)* \_\_\_\_\_; or
- ☐ I returned the summons unexecuted because \_\_\_\_\_; or
- ☐ Other *(specify)*: \_\_\_\_\_

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc: